

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA :

- v. -

: INDICTMENT

AHMED ABASSI, :

13 Cr.

Defendant. :

13 CRIM 304

- - - - - X

COUNT ONE

FRAUD AND MISUSE OF VISAS

The Grand Jury charges:

1. On or about April 15, 2013, in the Southern District of New York and elsewhere, AHMED ABASSI, the defendant, as permitted under penalty of perjury under Title 28, United States Code, Section 1746, did knowingly subscribe as true a false statement with respect to a material fact in an application, affidavit, and other document required by the immigration laws and regulations prescribed thereunder, and did knowingly present such application, affidavit, and other document which contained such false statement and which failed to contain a reasonable basis in law and fact, in order to facilitate an act of international terrorism as defined in Title 18, United States Code, Section 2331, to wit, ABASSI completed a Form I-765, Application for Employment Authorization, falsely

stating that he intended to remain in the United States for employment, when in fact he sought to remain in the United States to facilitate an act of international terrorism.

(Title 18, United States Code, Sections 1546(a) and 2.)

COUNT TWO

FRAUD AND MISUSE OF VISAS

The Grand Jury further charges:

2. On or about April 15, 2013, in the Southern District of New York and elsewhere, AHMED ABASSI, the defendant, as permitted under penalty of perjury under Title 28, United States Code, Section 1746, did knowingly subscribe as true, a false statement with respect to a material fact in an application, affidavit, and other document required by the immigration laws and regulations prescribed thereunder, and did knowingly present such application, affidavit, and other document which contained such false statement and which failed to contain a reasonable basis in law and fact, in order to facilitate an act of international terrorism as defined at Title 18, United States Code, Section 2331, to wit, ABASSI completed a Form I-485, Application to Register Permanent Residence or Adjust Status, falsely stating that he intended to remain in the United States for employment, when in fact he sought to remain

in the United States to facilitate an act of international terrorism.

(Title 18, United States Code, Sections 1546(a) and 2.)

FORFEITURE ALLEGATIONS

3. As a result of committing the visa fraud offenses alleged in Counts One and Two of this Indictment, AHMED ABASSI, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(6), all conveyances used in the commission of the offenses; all property, real and personal, that constitutes and is derived from and is traceable to proceeds obtained directly and indirectly from the commission of the offenses; and all property, real and personal, that was used to facilitate, and was intended to be used to facilitate, the commission of the offenses.

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Substitute Assets Provision

4. If any of the above-described forfeitable property, as a result of any or omission of AHMED ABASSI, the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value;  
or

e. has been commingled with other property  
which cannot be subdivided without difficulty,  
it is the intent of the United States, pursuant to Title 21,  
United States Code, Section 853(p), to seek forfeiture of any  
other property of ABASSI up to the value of the above  
forfeitable property described above.

(Title 18, United States Code, Section 982(a)(6)(A),  
and Title 21, United States Code, Section 854.)



FOREPERSON /

Preet Bharara  
PREET BHARARA  
United States Attorney

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SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

AHMED ABASSI,

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INDICTMENT

13 Cr.

(18 U.S.C. §§ 1546 & 2)

PREET BHARARA  
United States Attorney

A TRUE BILL

 / Foreperson

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